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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

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0000069

20 AUG 1986

MEMORANDUMSUBJECT: Ordot Landfill Quality Assurance Project Plan  
(July 24, 1986 draft - 1st revision)FROM: Terry L. Stumph, Chief *Terry L. Stumph*  
Environmental Services Branch, OPM (P-3)TO: Keith A. Takata, Chief  
Superfund Programs Branch, TWMD (T-4)

The subject document has been reviewed by Laura Tom and Kent M. Kitchingman. Kent's review was limited to the sections regarding air monitoring. Although the QAPjP is substantially improved, a number of the previous comments from the June 19 meeting and June 25 memorandum remain to be addressed. The following concerns must be addressed prior to approval of this plan. The comments are presented in order of occurrence in the plan.

- \*1. The project description does not indicate the analytical scheme to be used nor the analytical parameters of interest. The correlation between the parameters selected and the objectives needs to be identified. Why are dissolved metals of interest? What are the air compounds of interest and why are they important?

Appropriate text from sections 4.1, 6.4, and 6.6 of the sampling and analysis plan (SAP) should be incorporated into this Plan.

- \*2. Table 4-1. Precision goals for the CLP labs is based on laboratory duplicates not blind field duplicates. Precision goals must be established for the field duplicates.
3. Table 4-1. The table should indicate accuracy goals for the blind standard (quality control check) samples to be submitted (as described in §12.1).

Additional information on these blind check samples needs to be provided, including preparation of the samples parameters to be included, validation of reference values, etc..

4. Table 4-1. Goals must be established for particulate matter.

5. Section 5.2. Clarify the statement regarding exclusion of identification of air sampling locations from the sampling and analysis plan. The SAP does identify the sample collection location or at least the reason why they cannot be included (re: § 6.6 of SAP). However, the SAP should discuss the rationale for location selection.

\* Comment previously made at June 19, 1986 meeting and/or in June 25, 1986 memorandum.

6. Section 5.4. The source of water sample containers has been identified; however, the source of air sorbent tubes and their preparation is not and must be specified. Information from § 6.6 of the SAP needs to be incorporated or referenced.
7. Section 7.0. A summary/tabulation of the distribution of the multiple copies of the documents needs to be added. The info from § 6.7.2 of the SAP needs to be incorporated or at least referenced.
8. Section 9. The specific parameters of interest for the air monitoring must be provided. The specific analytical methods to be used for each parameter must also be identified. Information from § 6.6 of the SAP must be incorporated.

- \*9. Table 9-1. The method and/or reference for the analytical procedures used by the CLP for the RAS compounds is actually the Statement of Work (SOW). Although the SOW is based on the methods cited, there are some differences. The table should reflect the actual procedures to be used.

Method TO-3 for SAS organics requires cryogenic trapping; however, the section on sampling does not indicate that cryogenic trapping will be conducted.

The air methods identified in Table 6-6 of the does not agree with Table 9-1 of the QAPjP.

10. Section 9.2. The data requirements for the air SAS organics must be specified.
11. Section 10.2.1. The data validation procedures for the air SAS analytical data must be specified.
- \*12. Section 12.1. Internal quality control procedures for the air SAS analytical procedures must be specified. The information from § 6.6 of the SAP must be incorporated.

EPA Region 9 has established the following minimum field quality control:

- One (1) duplicate/matrix/concentration/parameter/day or 10% whichever results in the greatest number of samples.
- One (1) complete set of field blanks/matrix/parameter/day. Water field blanks need to be included in this project and discussed in the plan.

\*13. The EPA Region 9 QAO is Kent Kithchingman.

Incorporation of information on air monitoring from the SAP, i.e., § 6.6, should be done after Kent has completed his review of the details of the SAP. Comments on SAP will be forwarded under separate cover. If there are any questions regarding this review, please contact Kent at 4-0924.

cc: Kathleen Shimmin (T-3)  
Tom Mix (T-4-3) (with QAPjP attached)